

February 21, 2019  
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary  
Federal Communications Commission  
9050 Junction Drive  
Annapolis Junction, MD 20701

**RE: Onvoy, LLC, Minnesota Independent Equal Access Corporation, VoIP360, Inc., Voyant Communications, LLC, Broadvox-CLEC, LLC, Broadvox, LLC, Layered Communications, LLC, Onvoy Spectrum, LLC, ANPI, LLC, ANPI Business, LLC, Common Point, LLC, and Inteliquent, Inc.**  
EB Docket No. 06-36; CY 2018

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Onvoy, LLC, Minnesota Independent Equal Access Corporation, VoIP360, Inc., Voyant Communications, LLC, Broadvox-CLEC, LLC, Broadvox, LLC, Layered Communications, LLC, Onvoy Spectrum, LLC, ANPI, LLC, ANPI Business, LLC, Common Point, LLC, and Inteliquent, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to [croesel@inteserra.com](mailto:croesel@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/ Carey Roesel

Carey Roesel  
Consultant

cc: Daniel Meldazis - Inteliquent  
tms: FCCx1901

Enclosures  
CR/gS

**Annual 47 C.F.R § 64.2009 (e) CPNI Certification  
EB DOCKET 06-36**

**Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018**

**Names and Form 499 Filer IDs of Companies covered by this certification:**

<u><b>Name</b></u>	<u><b>Form 499 Filer ID</b></u>
<b>Onvoy, LLC</b>	<b>820189</b>
<b>Minnesota Independent Equal Access Corporation</b>	<b>803187</b>
<b>VoIP360, Inc.</b>	<b>826935</b>
<b>Voyant Communications, LLC</b>	<b>826128</b>
<b>Broadvox-CLEC, LLC</b>	<b>827640</b>
<b>Broadvox, LLC</b>	<b>826005</b>
<b>Layered Communications, LLC</b>	<b>829009</b>
<b>Onvoy Spectrum, LLC</b>	<b>832107</b>
<b>ANPI, LLC</b>	<b>824974</b>
<b>ANPI Business, LLC</b>	<b>820850</b>
<b>Common Point, LLC</b>	<b>830526</b>
<b>Inteliquent, Inc.</b>	<b>823690</b>

**Name of Signatory:** Scott Sawyer

**Title of signatory:** General Counsel and Secretary

**Certification:**

I, Scott Sawyer, certify that I am an officer of Onvoy, LLC, Minnesota Independent Equal Access Corporation, VoIP360, Inc., Voyant Communications, LLC, Broadvox-CLEC, LLC, Broadvox, LLC, Layered Communications, LLC, Onvoy Spectrum, LLC, ANPI, LLC, ANPI Business, LLC, Common Point, LLC, and Inteliquent, Inc. (collectively the “Companies”), and acting as an agent of the Companies, that I have personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the Commission’s CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the Companies’ procedures ensure that the Companies are in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission’s rules.

The Companies have not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The Companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Each Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. Each Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed   
\_\_\_\_\_  
Scott Sawyer, General Counsel and Secretary

Attachment: Accompanying Statement explaining CPNI procedures

**ONVOY, LLC  
MINNESOTA INDEPENDENT EQUAL ACCESS CORPORATION  
VOIP360, INC.  
VOYANT COMMUNICATIONS, LLC  
BROADVOX-CLEC, LLC  
BROADVOX, LLC  
LAYERED COMMUNICATIONS, LLC  
ONVOY SPECTRUM, LLC  
ANPI, LLC  
ANPI BUSINESS, LLC  
COMMON POINT, LLC  
INTELIQUENT, INC.**

**STATEMENT EXPLAINING HOW THE COMPANIES' OPERATING PROCEDURES  
ENSURE COMPLIANCE WITH THE FCC'S CPNI RULES**

Onvoy, LLC, Minnesota Independent Equal Access Corporation, VoIP360, Inc., Voyant Communications, LLC, Broadvox-CLEC, LLC, Broadvox, LLC, Layered Communications, LLC and Onvoy Spectrum, LLC, ANPI, LLC, ANPI Business, LLC, Common Point, LLC, Inteliquent, Inc. (collectively the "Companies") have established policies, practices and procedures designed to ensure that they are in compliance with the Federal Communications Commission's ("Commission") rules regarding the use, disclosure and access to CPNI. The Companies provides this statement pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules pertaining to customer proprietary network information ("CPNI") set forth in Sections 64.2001-64.2011.

The Companies do not use or permit access to CPNI to market any services outside of the "total services approach" as specified in 47 CFR §64.2005. Nor do the Companies allow affiliates or third party access to CPNI for marketing-related purposes.

Consistent with the Commission's rules, the Companies use, disclose and permit access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of the Companies, other users, and other carriers from unlawful use; (3) providing inside wiring, installation, maintenance, and repair services; and (4) providing or marketing services that are within the same class of services to which the customer already subscribes.

The Companies have designated a CPNI Compliance Officer who is responsible for: (1) communicating with the Companies' attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of the Companies employees and agents who use or have access to CPNI; (3) supervising the use, disclosure, distribution or access to the Companies' CPNI by independent contractors and joint venture partners; (4) maintaining records regarding the use of CPNI in marketing campaigns; and (5) receiving, reviewing and resolving questions or issues regarding use, disclosure, distribution or provision of access to CPNI.

The Companies have implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, the Companies will notify affected customers. The Companies will maintain a record of any CPNI-related breaches for a period of at least two years.

The Companies provides training concerning CPNI procedures. All employees of the Companies are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by the Companies. Employees of the Companies who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.

The Companies disclose or release call detail information to customers during customer-initiated telephone contacts only when the customer provides a pre-established password. If the customer does not provide a password, call detail information is released only by sending it to the customer's address of record or by the carrier calling the customer at the telephone number of record.

The Companies permits customers to establish online accounts, but requires that an appropriate password be furnished by the customer before he or she can access any CPNI in his or her online account. Passwords may not be based upon readily obtainable biographical information or account information.

The Companies have adopted a policy that it does not and will not use, disclose or permit access to CPNI in connection with Companies' initiated marketing of services to which a customer does not already subscribe from the Companies.